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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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DANNY ALVAREZ RODRIGUEZ, an  
individual,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
State of Nevada; DERRICK CHANDLER, an  
individual; DOES I-V, inclusive,

Defendants.

CASE NO. 2:24-cv-230-JAD-NJK

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES AND  
CONTINUE TRIAL**

**[FIRST REQUEST]**

Pursuant to LR 6-1 and LR 26-3, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case by ninety (90) days, up to and including Wednesday, October 30, 2024. In addition, the parties request that all other future deadlines contemplated by the Discovery Plan and Scheduling Order be extended pursuant to Local Rule. In support of this Stipulation and Request, the parties state as follows:

1. On December 28, 2023, Plaintiff filed his Complaint in the Eighth Judicial District Court, Nevada.



next few months that will continue to require him to be out of the jurisdiction for extended periods of time. The obligation is unavoidable. For those reasons, the parties respectfully request an extension of the discovery deadlines in this matter.

Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-3 governs modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-3.

This is the first request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension.

The following is a list of the current discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>Thursday, August 1, 2024</i>	<i>Wednesday, October 30, 2024</i>
Deadline to Amend Pleadings or Add Parties	<i>Wednesday, May 1, 2024</i>	<i>Tuesday, July 30, 2024</i>
Expert Disclosure pursuant to FRCP26 (a)(2)	<i>Friday, May 31, 2024</i>	<i>Thursday, August 29, 2024</i>
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	<i>Monday, July 1, 2024</i>	<i>Monday, September 30, 2024</i>
Dispositive Motions	<i>Monday, September 2, 2024</i>	<i>Monday, December 2, 2024</i>
Joint Pretrial Order	<i>Wednesday, October 2, 2024</i>	<i>Tuesday, December 31, 2024</i>  <i>If dispositive motions are pending, the parties will submit their Joint Pretrial Order within thirty (30) days of the Court's order as to any dispositive motions.</i>

1 WHEREFORE, the parties respectfully request this Court extend the discovery period by  
2 ninety (90) days from the current deadline of August 1, 2024 up to and including October 30,  
3 2024, and extend the other dates as outlined in accordance with the table above.

4 IT IS SO STIPULATED.

5 DATED the 23<sup>rd</sup> day of April, 2024.

DATED the 23<sup>rd</sup> day of April, 2024.

6 **BREEDEN & ASSOCIATES, PLLC**

**LEWIS BRISBOIS BISGAARD & SMITH, LLP**

7 Adam J. Breeden

/s/ Robert W. Freeman


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11 *Attorneys for Defendants*

12 **ORDER**

13 IT IS SO ORDERED.

14 Dated: April 23, 2024

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United States Magistrate Judge  
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